

# Exhibit 16



Lori G. Cohen  
Tel 678.553.2385  
Fax 678.553.2386  
cohenl@gtlaw.com

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**VIA E-MAIL ONLY**

Ruben Honik  
David Stanoch  
Golomb & Honik, P.C.  
1835 Market Street  
Suite 2900  
Philadelphia, PA 19103  
[rhonik@golombhonik.com](mailto:rhonik@golombhonik.com)  
[dstanoch@golombhonik.com](mailto:dstanoch@golombhonik.com)

Adam Slater  
Mazie Slater Katz & Freeman, LLC  
103 Eisenhower Parkway  
Suite 207  
Roseland, NJ 07068  
[aslater@mazieslater.com](mailto:aslater@mazieslater.com)

Daniel Nigh  
Levin Papantonio Thomas Mitchell Rafferty  
& Proctor, P.A.  
316 S. Baylen  
Suite 600  
Pensacola, FL 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Conlee Whiteley  
Kanner & Whiteley, LLC  
701 Camp Street  
New Orleans, LA 70130  
[c.whiteley@kanner-law.com](mailto:c.whiteley@kanner-law.com)

**Re: *In re Valsartan Products Liability Litigation*, U.S. District Court for the  
District of New Jersey; Case No. 1:19-md-02875-RBK-JS**

Dear Counsel:

Pursuant to Case Management Order No. 12 (DN 185), enclosed please find the Disclosure of Facility, Corporate Organization, and ANDA Information on behalf of Finished Dose Manufacturer and Distributor Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis LLC, Actavis Pharma, Inc., and Arrow Pharm (Malta) Ltd.<sup>1</sup> (collectively, "the Teva Defendants").

We remind you that the enclosed document has been marked confidential and is not to be disclosed in any fashion, nor be used for any purpose other than the analysis and preparation for trial of this action, and shall not otherwise be disclosed or made available to any counsel in any matter outside of this litigation, as such sharing is prohibited by the terms of the Confidentiality and Protective Order entered by the Court in this matter (DN 139).

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<sup>1</sup> Undersigned counsel notes that Arrow Pharm (Malta) Ltd. has not been served, and no longer exists as a separate legal entity. This production does not represent Arrow Pharm (Malta) Ltd. or any successor in interest's consent to jurisdiction in this or any underlying matter, and Arrow Pharm (Malta) Ltd. and its successor in interest specifically reserve the right to raise any and all defenses, jurisdictional or otherwise.

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Page 2

In addition, please note the enclosed disclosure is being produced pursuant to federal discovery rules. Production of the enclosed document is not, and should not be considered, in any manner whatsoever, a waiver of the Teva Defendants' rights, privileges or defenses, including their rights under federal law to object to the relevance or admissibility of the document or information contained therein as evidence at any future hearing or trial of this matter. Further, the production of the enclosed document is not, and should not be considered in any manner whatsoever, a waiver of any privilege available to the Teva Defendants under federal or applicable state law, and the Teva Defendants hereby expressly reserve and preserve each and every privilege available under applicable law.

Please feel free to contact me if you have any questions or concerns.

Respectfully,

/s/ Lori G. Cohen  
Lori G. Cohen, Esq.  
Attorney for Teva Pharmaceuticals USA,  
Inc., Teva Pharmaceutical Industries Ltd.,  
Actavis LLC, and Actavis Pharma, Inc.

Enclosure

cc: Jessica Priselac, Esq. (*via email, for distribution to Defendants' Counsel*)  
Seth A. Goldberg, Esq. (*via email*)  
Clem C. Trischler, Esq. (*via email*)  
Victoria D. Lockard, Esq. (*via email*)  
Brian H. Rubenstein (*via email*)  
Steven M. Harkins, Esq. (*via email*)